

EXHIBIT B

EXHIBIT B: Disputed Claim Terms
P.R. 4-3 Joint Claim Construction and Prehearing Statement

Claim Term	VirnetX's Proposed Construction	Defendants' Proposed Construction
Terms Concerning Multiple Patents		
between the client computer and the target computer	[no construction necessary]	extending from the client computer to the target computer
between the client computer and the secure target computer		extending from the client computer to the secure target computer
between the client computer and the secure web computer		extending from the client computer to the secure web computer
between the client and a second computer		extending from the client to a second computer
between the client and the secure server		extending from the client computer to the secure server
between the first location and the second location		extending from the first location to the second location
between a first location and a second location		extending from a first location to a second location
between the first computer and a second computer		extending from the first computer to a second computer
'135 Patent '151 Patent '504 Patent '211 Patent '759 Patent		

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domain name '135 Patent '151 Patent '180 Patent '504 Patent '211 Patent	a name corresponding to an IP address	a hierarchical sequence of words in decreasing order of specificity that corresponds to a numerical IP address.
Domain Name Service (DNS) '135 Patent '180 Patent '504 Patent '211 Patent	a lookup service that returns an IP address for a requested domain name	a lookup service that returns an IP address for a requested domain name to the requester
domain name service system '504 '211	a computer system that includes a domain name service (DNS)	a DNS that is capable of differentiating between, and responding to, both standard and secure top-level domain names
secure communication link '504 '211 '759	an encrypted communication link	virtual private network communication link
top-level domain name '504 '211	a label that identifies a first level subdomain	a label that identifies a first level subdomain of the DNS root domain

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virtual private network '135 Patent '180 Patent '759 Patent	a network of computers which privately communicate with each other by encrypting traffic on insecure communication paths between the computers	a network of computers which privately and directly communicate with each other by encrypting traffic on insecure communication paths between the computers where the communication is both secure and anonymous
U.S. Patent No. 6,502,135		
determining whether the DNS request transmitted in step (1) is requesting access to a secure web site	[no construction necessary]	determining on a DNS proxy server whether the DNS request transmitted in step (1) is requesting access to a secure web site
DNS proxy server	a computer or program that responds to a domain name inquiry in place of a DNS	a computer or program that responds to a domain name inquiry in place of a DNS, and prevents destination servers from determining the identity of the entity sending the domain name inquiry
generating from the client computer a Domain Name Service (DNS) request	[no construction necessary]	creating and transmitting from the client computer a DNS request
secure target web site	a target computer associated with a domain name and that can communicate in a virtual private network	a secure web site on the target computer
secure web site	a computer associated with a domain name and that can communicate in a	a web site that requires authorization for access and that can communicate in a

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	virtual private network	VPN
target computer	a computer with which the client computer seeks to communicate	the ultimate destination with which the client computer seeks to communicate
virtual private link	a communication link that permits computers to privately communicate with each other by encrypting traffic on insecure communication paths between the computers	a communication pathway that permits computers to privately communicate with each other by encrypting traffic on insecure communication paths between the computers and accomplishes data security and anonymity through the use of hop tables
web site	a computer associated with a domain name and that can communicate in a network	one or more related web pages at a location on the World Wide Web
allocates VPN resources	No construction necessary, alternatively a construction that is consistent with the ordinary meaning of these terms.	[indefinite]
allocates resources	No construction necessary, alternatively a construction that is consistent with the ordinary meaning of these terms.	[indefinite]
allocating resources	No construction necessary, alternatively a construction that is consistent with the	[indefinite]

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	ordinary meaning of these terms.	
in response to determining that the DNS request in step (2) is not requesting access to a secure target web site	[no construction necessary]	[indefinite]
wherein the gatekeeper computer determines whether the client computer has sufficient security privilege . . . and, if the client computer lacks sufficient security privileges, rejecting the request to create the VPN	[no construction necessary]	[indefinite]
U.S. Patent No. 7,490,151		
secure server	a server that requires authorization for access and that can communicate in a secure communication link	a server that requires authorization for access and communicates in a VPN
secure web computer	a server that requires authorization for access and that can communicate in a secure communication link	[indefinite or "the target computer that hosts the secure web site"]
forwarding the DNS request to a DNS function	No construction necessary, alternatively a construction that is consistent with the ordinary meaning of these terms.	[indefinite]

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U.S. Patent No. 7,188,180		
secure domain name	a non-standard domain name that corresponds to a secure computer network address	a non-standard domain name that corresponds to a secure computer network address and cannot be resolved by a conventional DNS
secure domain name service	a lookup service that returns a secure network address for a requested secure domain name	a non-standard lookup service that requires authorization for access, recognizes that a query message is requesting a secure computer address, and performs its services accordingly by returning a secure network address for a requested secure domain name
provisioning information	No construction necessary, alternatively a construction that is consistent with the ordinary meaning of these terms.	[indefinite]
U.S. Patent No. 7,418,504		
an indication that the domain name service system supports establishing a secure communication link	[no construction necessary]	a visible message or signal that informs the user that the domain name service system supports establishing a secure communication link
U.S. Patent No. 7,921,211		

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indicate/indicating . . . whether the domain name service system supports establishing a secure communication link	[no construction necessary]	display/displaying a visible message or signal that informs the user whether the domain name service system supports establishing a secure communication link
U.S. Patent No. 6,839,759		
cryptographic information	information that is used to encode data or information that is used to decode data	information that is required in order to encode/decode or encrypt to ensure secrecy
enabling a secure communication mode of communication	[no construction necessary]	using an input device to select a secure communication mode of communication